



**Environmental  
Protection Agency**

John R. Kasich, **Governor**

Mary Taylor, **Lt. Governor**

Scott J. Nally, **Director**

Re: Hancock County  
The Mennel Milling Company  
Premise # 0332020069  
Resolution of Violation

September 25, 2012

Mr. Scott Flick  
Plant Manager  
The Mennel Milling Company  
320 Findlay Street  
P.O. Box 806  
Fostoria, Ohio 44830

Dear Mr. Flick:

This letter shall serve as a follow-up to the Notice of Violation (NOV) letters dated March 14, 2012 and May 16, 2012, for the above-referenced facility. The purpose of this letter is to indicate the facility's resolution of these violations. This was accomplished by the issuance of Permit to Install/Operate (PITO) P0110357 for emission unit P905 (100 headhouse) and PTIO P0110359 for emission units P903 (truck receiving with transferring, conveying, and storage), P904 (200 headhouse), and P905 (railcar unloading) issued August 21, 2012.

In addition, The Mennel Milling Company (herein referred to as "Mennel") provided the required compliance plan on June 14, 2012 and preformed stack tests on three baghouses associated with emission units P903, P904, P905, and P906 on August 1 through 3, 2012. A letter summarizing the stack testing results was issued by Ohio EPA on September 14, 2012. Based upon the results of the stack testing, control devices associated with the emission units subject to New Source Performance Standards (NSPS) for Grain Elevators under 40 CFR Part 60, Subpart DD are demonstrating compliance with capture and control efficiency limitations required by NSPS regulations and their associated PTIO permits.

On June 14, 2012, Mennel provided emission calculations for four operating emission units which demonstrate particulate emissions from these four emission units would qualify as "de minimis" under OAC Rule 3745-15-05. These four emission units include: F002 (truck bulk loading); F003 (railcar bulk loading); F004 (paved and unpaved roadways); and P009 (milling operations). Each of these four emission units will be assigned an exemption status of "de minimis" under the facility profile.

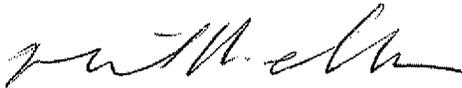
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Mennel is reminded that as a requirement of OAC 3745-15-05, the "de minimis" exemptions discussed above requires Mennel to maintain records that show that emissions of any air contaminant from the source did not exceed ten pounds per day on each day the source emitted air contaminants, and that the source in any one year did not emit more than one ton of hazardous air pollutants as defined in division (1) of section 3704.03 of the Revised Code, and that the emissions from the source, in combination with similar air contaminant from the facility did not result in excess of 25 tons during the preceding calendar year.

Please note; however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violations noted in the NOV letters. The decisions on whether to pursue or decline to pursue such penalties regarding this are dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should you have any questions and/or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at [Miranda.Garlock@epa.ohio.gov](mailto:Miranda.Garlock@epa.ohio.gov).

Sincerely,



Miranda R. Garlock  
Division of Air Pollution Control

/cg

ec: Miranda Garlock, NWDO, DAPC  
Julie McCarthy, NWDO, DAPC  
Jan Tredway, NWDO, DAPC  
Jennifer Jolliff, NWDO, DAPC  
Bruce Weinberg, CO, DAPC  
William MacDowell, US EPA, Region V  
Michael Lake  
Scott Flick